

EXHIBIT A

PROPOSED ORDER

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No: 22-11068 (JTD)

(Jointly Administered)

Re: D.I. ____

**ORDER GRANTING EDEN PROTOCOL LIMITED'S
MOTION FOR ENTRY OF AN ORDER (I) GRANTING RELIEF
FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362(d), (II) WAIVING
BANKRUPTCY RULE 4001, AND (III) GRANTING RELATED RELIEF**

Upon consideration of *Eden Protocol Limited's Motion for Entry of an Order (I) Granting Relief from the Automatic Stay Under 11 U.S.C. § 362(d), (II) Waiving Bankruptcy Rule 4001, and (III) Granting Related Relief* [D.I. ____] (the “Motion”),² all as more fully set forth in the Motion; and upon consideration of the Munoz Declaration; and the United States District Court for the District of Delaware having jurisdiction to consider this Motion under 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that Eden Protocol's notice of the Motion and opportunity for a hearing on the Motion were appropriate

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Motion.

under the circumstances and that no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the “Hearing”); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is GRANTED, and the automatic stay is lifted as set forth herein.
2. Eden Protocol is allowed to exercise its contractual rights, pursuant to the TPA, to terminate the TPA and is not required to deliver Tokens to the Purchaser or any of the Debtors; *provided, however,* that Eden Protocol shall return the full amount of the Purchase Price to Maclaurin within seven (7) days of entry of this Order.
3. Eden Protocol is authorized, as reasonably necessary, to take any actions necessary to effectuate the termination of the TPA.
4. Eden Protocol is authorized and empowered to take all actions necessary to implement the relief granted in this Order.
5. Bankruptcy Rule 4001(a)(3) is hereby waived and this Order shall be immediately effective and enforceable upon its entry.
6. The Court retains jurisdiction with respect to all matters arising from or related to the interpretation or implementation of this Order.